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U.S. DISTRICT COURT E.D.N.Y.

★ DEC 01 2011 ★

LONG ISLAND OFFICE

JJD:RAT  
F.# 2011R01898

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

MICHAEL MARANDA,  
PAUL GOMES and  
RUSSELL ALGAZE,  
also known as "Alex,"

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§  
841(b)(1)(B)(vii),  
846, 853(a) and  
853(p); T. 18, U.S.C.,  
§§ 3551 et seq.)

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

CONSPIRACY TO DISTRIBUTE MARIJUANA

BROWN, M. J.

1. In or about and between July 2011 and November 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MICHAEL MARANDA, PAUL GOMES and RUSSELL ALGAZE, also known as "Alex," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 100 or more marijuana plants, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(vii); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendants that, upon conviction of the above-charged offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;  
or

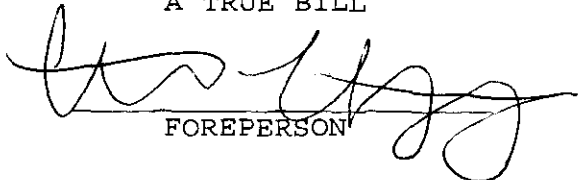
(e) has been commingled with other property which cannot be divided without difficulty;

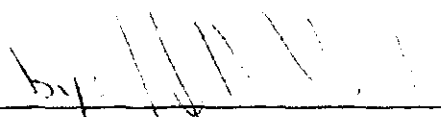
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of such defendants up to the value of the  
forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and  
853(p))

A TRUE BILL

  
FOREPERSON

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. 2011R01898

FORM DBD-34  
JUN. 85

**UNITED STATES DISTRICT COURT**

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MICHAEL MARANDA,  
PAUL GOMES and  
RUSSELL ALGAZE,  
also known as "Alex,"

Defendants.

INDICTMENT

T. 21, U.S.C., §§ 841 (b) (1) (B) (vii), 846, 853 (a) and 853 (p); T. 18, U.S.C., §§ 3551 et seq.

A true bill.

Foreman

Filed in open court this \_\_\_\_\_ day.

of \_\_\_\_\_ A.D. 19 \_\_\_\_\_

Clerk

Bail, \$ \_\_\_\_\_

RAYMOND A. TIERNEY, (631) 715-7849